

1 TIMOTHY COURCHAINE
2 United States Attorney
3 District of Arizona
4 ADAM D. ROSSI
5 Assistant U.S. Attorney
6 United States Courthouse
405 W. Congress Street, Suite 4800
Tucson, Arizona 85701
Telephone: 520-620-7300
Email: adam.rossi2@usdoj.gov
Attorneys for Plaintiff

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CLERK US DISTRICT COURT
DISTRICT OF ARIZONA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,

Plaintiff,

vs.

1. Eduardo Silva,
(Counts 1-20),
2. Rafael Silva-Fregoso,
(Counts 21-23)
3. Roberto Rodriguez-Mora,
(Counts 24-25)

Defendants.

CR25-01890 TUC-RCC(MSA)

INDICTMENT

VIO: 18 U.S.C. §§ 922(a)(6) and
924(a)(2)
(Material False Statement
During the Purchase of a Firearm)
Counts 1-25

18 U.S.C. § 924(d);
28 U.S.C. § 2461(c)
(Forfeiture Allegation)

THE GRAND JURY CHARGES:

COUNTS 1-20

On or about the dates listed below, in the District of Arizona, the defendant, EDUARDO SILVA, in connection with the acquisition of firearms, knowingly made false statements and representations to the businesses listed below, which were intended and likely to deceive the business as to a fact material to the lawfulness of a sale of a firearm by the business, each of which was licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of each business listed below, in

1 that the defendant, in connection with the purchase of each of the firearms below, stated
 2 that he was the actual transferee/buyer of the firearm, whereas in truth and fact, he was
 3 knowingly acquiring the firearm on behalf of another individual:

Count	Date	Business	Firearms
1	12/02/2023	Murphy's Guns	One (1) Umarex model HK416D, .22 caliber rifle
2	01/24/2024	Turner's Outdoorsman	One (1) Smith and Wesson model M&P 22, .22 caliber pistol
3	01/24/2024	Turner's Outdoorsman	One (1) Walther model WMP, .22 caliber pistol
4	01/25/2024	Diamondback Shooting Sports	One (1) Mossberg model 600AT, 12-gauge shotgun
5	01/27/2024	Elite Guns and Ammo	One (1) Smith and Wesson model M&P 22, .22 caliber pistol
6	02/15/2024	Sportsman's Warehouse	One (1) Keltec CNC Industries model PMR-30, .22 caliber pistol
7	02/24/2024	Elite Guns and Ammo	One (1) Colt model Government, .38 caliber pistol
8	02/24/2024	Elite Guns and Ammo	One (1) Walther model Colt Government, .22 caliber pistol
9	02/24/2024	Elite Guns and Ammo	One (1) CZ model CZ 600 ST2, .308 caliber rifle
10	05/17/2024	Quick Trip Pawn	One (1) Marlin Firearms Co. model Glenfield 60, .22 caliber rifle
11	07/02/2024	Elite Guns and Ammo	One (1) Ruger model 10/22, .22 caliber rifle

1	12	10/26/2024	Sportsman's Warehouse	One (1) Smith and Wesson model M&P 22 Magnum, .22 caliber pistol
2	13	11/14/2024	Quick Trip Pawn	One (1) Beretta model 80X Cheetah, .380 caliber pistol
3	14	11/21/2024	Quick Trip Pawn	One (1) Remington Arms model 870 Express Magnum, 12-gauge shotgun
4	15	11/29/2024	Quick Trip Pawn	One (1) Winchester model 290, .22 caliber rifle
5	16	11/30/2024	Sportsman's Warehouse	One (1) Istanbul Arms model Winchester SXP, 12-gauge shotgun
6	17	12/02/2024	Zona Tactical	One (1) Ruger model 10/22, .22 caliber rifle
7	18	12/02/2024	Catalina Pawn	One (1) Ruger model 10/22, .22 caliber rifle
8	19	12/02/2024	Catalina Pawn	One (1) Armscor model M1911-A1 FS, .38 caliber pistol
9	20	12/02/2024	Catalina Pawn	One (1) Sig Saur model P322, .22 caliber pistol

19 All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

20 **COUNTS 21-23**

21 On or about the dates listed below, in the District of Arizona, the defendant,
22 RAFAEL SILVA-FREGOSO, in connection with the acquisition of firearms, knowingly
23 made false statements and representations to the businesses listed below, which were
24 intended and likely to deceive the business as to a fact material to the lawfulness of a sale
25 of a firearm by the business, each of which was licensed under the provisions of Chapter
26 44 of Title 18, United States Code, with respect to information required by the provisions
27 of Chapter 44 of Title 18, United States Code, to be kept in the records of each business
28

1 listed below, in that the defendant, in connection with the purchase of each of the firearms
 2 below, stated that he was the actual transferee/buyer of the firearm, whereas in truth and
 3 fact, he was knowingly acquiring the firearm on behalf of another individual:

Count	Date	Business	Firearms
21	03/29/2024	Catalina Pawn	One (1) Ruger model 01103, .22 caliber rifle
22	11/02/2024	Sportsman's Warehouse	One (1) Ruger model 10/22, .22 caliber rifle
23	11/02/2024	Sportsman's Warehouse	One (1) Beretta model 80X Cheetah, .380 caliber pistol

11 All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

12 **COUNTS 24-25**

13 On or about the dates listed below, in the District of Arizona, the defendant,
 14 ROBERTO RODRIGUEZ-MORA, in connection with the acquisition of firearms,
 15 knowingly made false statements and representations to the businesses listed below, which
 16 were intended and likely to deceive the business as to a fact material to the lawfulness of a
 17 sale of a firearm by the business, each of which was licensed under the provisions of
 18 Chapter 44 of Title 18, United States Code, with respect to information required by the
 19 provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of each
 20 business listed below, in that the defendant, in connection with the purchase of each of the
 21 firearms below, stated that he was the actual transferee/buyer of the firearm, whereas in
 22 truth and fact, he was knowingly acquiring the firearm on behalf of another individual:

Count	Date	Business	Firearms
24	05/11/2024	Turner's Outdoorsman	One (1) HS Produkt model Hellcat Pro, 9mm caliber pistol
25	05/11/2024	Turner's Outdoorsman	One (1) Ruger model AR-556, 5.56 caliber rifle

1 All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2)

2 **FORFEITURE ALLEGATION**

3 Upon conviction of Counts 1 through 25 of the Indictment, the defendants,
 4 EDUARDO SILVA, RAFAEL SILVA-FREGOSO, and ROBERTO RODRIGUEZ-
 5 MORA, shall forfeit to the United States pursuant to Title 18, United States Code, Section
 6 924(d), and Title 28, United States Code, Section 2461(c), any firearms and ammunition
 7 involved in the commission of the offense, including, but not limited to:

Line #	Asset Description	Serial Number
1	One (1) Umarex model HK416D, .22 caliber rifle	HB042106
2	One (1) Smith and Wesson model M&P 22, .22 caliber pistol	PJW3582
3	One (1) Walther model WMP, .22 caliber pistol	WT023404
4	One (1) Mossberg model 600AT, 12-gauge shotgun	G850133
5	One (1) Smith and Wesson model M&P 22, .22 caliber pistol	PJZ5531
6	One (1) Keltec CNC Industries model PMR-30, .22 caliber pistol	WYNX61
7	One (1) Colt model Government, .38 caliber pistol	GV036211
8	One (1) Walther model Colt Government, .22 caliber pistol	WD096261
9	One (1) CZ model CZ 600 ST2, .308 caliber rifle	H173169
10	One (1) Marlin Firearms Co. model Glenfield 60, .22 caliber rifle	26386863
11	One (1) Ruger model 10/22, .22 caliber rifle	R75-36216
12	One (1) Smith and Wesson model M&P 22 Magnum, .22 caliber pistol	PKK1135
13	One (1) Beretta model 80X Cheetah, .380 caliber pistol	Y031490X

1	One (1) Remington Arms model 870 Express Magnum, 12-gauge shotgun	A994034M
2		
3	One (1) Winchester model 290, .22 caliber rifle	557014
4		
5	One (1) Istanbul Arms model Winchester SXP, 12-gauge shotgun	TR6024-009087SP
6		
7	One (1) Ruger model 10/22, .22 caliber rifle	R75-35192
8		
9	One (1) Ruger model 10/22, .22 caliber rifle	0012-55958
10		
11	One (1) Armscor model M1911-A1 FS, .38 caliber pistol	RIA2362077
12		
13	One (1) Sig Saur model P322, .22 caliber pistol	73A168837
14		
15	One (1) Ruger model 01103, .22 caliber rifle	0024-69054
16		
17	One (1) Ruger model 10/22, .22 caliber rifle	R75-76708
18		
19	One (1) Beretta model 80X Cheetah, .380 caliber pistol	Y030099X
20		
21	One (1) HS Produkt model Hellcat Pro, 9mm caliber pistol	BE216097
22		
23	One (1) Ruger model AR-556, 5.56 caliber rifle	1851-47758
24		

If any of the property described above, as a result of any act or omission of the defendant: a) cannot be located upon the exercise of due diligence; b) has been transferred or sold to, or deposited with, a third party; c) has been placed beyond the jurisdiction of the court; d) has been substantially diminished in value; or e) has been commingled with other property which cannot be divided without difficulty, it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property, including, but not limited to, all property, both real and personal, owned by the defendant.

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1 All pursuant to Title 18, United States Code, Section 924(d), Title 28, United States
2 Code, Section 2461(c), and Rule 32.2(a), Federal Rules of Criminal Procedure.

3 A TRUE BILL
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6 FOREPERSON OF THE GRAND JURY
7 Date: April 16, 2025

8
9 TIMOTHY COURCHAINE
United States Attorney
District of Arizona

REDACTED FOR
PUBLIC DISCLOSURE

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11 ADAM D. ROSSI
Assistant U.S. Attorney

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